

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

This Document Relates to:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-03047-YGR

**JOINT CHART OF ESI ORDER
DISPUTES PURSUANT TO DISCOVERY
MANAGEMENT ORDER NO. 1**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to the Court’s December 15, 2023 Discovery Management Order No. 1 (ECF 503), the parties submit the Joint Chart regarding outstanding disputes over their submission of an order governing the production of electronically stored information and hard copy documents (“ESI Order”), attached hereto as Exhibit A. Counsel, together with the parties’ ESI consultants, have met and conferred at length in an effort to narrow the parties’ disputes. If the Court would like copies of the parties’ revised ESI Orders and a new redline (which the parties believe would be helpful to the Court in resolving the disputes), please let the parties know.

DATED: January 12, 2024

Respectfully submitted,

/s/ Christopher L. Ayers

1 LEXI J. HAZAM
2 **LIEFF CABRASER HEIMANN &**
3 **BERNSTEIN, LLP**
4 275 BATTERY STREET, 29TH FLOOR
5 SAN FRANCISCO, CA 94111-3339
6 Telephone: 415-956-1000
7 lhazam@lchb.com

8 CHRISTOPHER A. SEEGER
9 CHRISTOPHER L. AYERS
10 **SEEGER WEISS, LLP**
11 55 CHALLENGER ROAD, 6TH FLOOR
12 RIDGEFIELD PARK, NJ 07660
13 Telephone: 973-639-9100
14 Facsimile: 973-679-8656
15 cseeger@seegerweiss.com
16 cayers@seegerweiss.com

17 PREVIN WARREN
18 **MOTLEY RICE LLC**
19 401 9th Street NW Suite 630
20 Washington DC 20004
21 T: 202-386-9610
22 pwarren@motleyrice.com

23 Co-Lead Counsel

24 JENNIE LEE ANDERSON
25 **ANDRUS ANDERSON, LLP**
26 155 MONTGOMERY STREET, SUITE 900
27 SAN FRANCISCO, CA 94104
28 Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

JOSEPH G. VANZANDT
BEASLEY ALLEN CROW METHVIN
PORTIS & MILES, P.C.
234 COMMERCE STREET
MONTGOMERY, AL 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

EMILY C. JEFFCOTT
MORGAN & MORGAN
220 W. GARDEN STREET, 9TH FLOOR
PENSACOLA, FL 32502
Telephone: 850-316-9100
ejeffcott@forthepeople.com

RON AUSTIN
RON AUSTIN LAW
400 Manhattan Blvd.
Harvey LA, 70058

1 Telephone: (504) 227-8100
2 raustin@ronaustinlaw.com

3 MATTHEW BERGMAN
4 GLENN DRAPER
5 **SOCIAL MEDIA VICTIMS LAW CENTER**
6 821 SECOND AVENUE, SUITE 2100
7 SEATTLE, WA 98104
8 Telephone: 206-741-4862
9 matt@socialmediavictims.org
10 glenn@socialmediavictims.org

11 JAMES J. BILSBORROW
12 **WEITZ & LUXENBERG, PC**
13 700 BROADWAY
14 NEW YORK, NY 10003
15 Telephone: 212-558-5500
16 Facsimile: 212-344-5461
17 jbilborrow@weitzlux.com

18 PAIGE BOLDT
19 **WATTS GUERRA LLP**
20 4 Dominion Drive, Bldg. 3, Suite 100
21 San Antonio, TX 78257
22 T: 210-448-0500
23 PBoldt@WattsGuerra.com

24 THOMAS P. CARTMELL
25 **WAGSTAFF & CARTMELL LLP**
26 4740 Grand Avenue, Suite 300
27 Kansas City, MO 64112
28 T: 816-701 1100
tcartmell@wcllp.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 MADISON AVE, 7TH FLOOR
NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

CARRIE GOLDBERG
C.A. GOLDBERG, PLLC
16 Court St.
Brooklyn, NY 11241
T: (646) 666-8908
carrie@cagoldberglaw.com

KIRK GOZA
GOZA & HONNOLD, LLC
9500 Nall Avenue, Suite 400
Overland Park, KS 66207
T: 913-451-3433
kgoza@gohonlaw.com

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

SIN-TINY MARY LIU
**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 BROADWAY, SUITE 2100
OAKLAND, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY
316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600
Encino, CA 91436
Telephone: (818) 839-2333
Facsimile: (818) 986-9698
rtellis@baronbudd.com
dfernandes@baronbudd.com

ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
T: 202-780-3014
awalsh@alexwalshlaw.com

MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 WALNUT STREET
SUITE 500
PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com

DIANDRA "FU" DEBROSSE ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203

Telephone: 205.855.5700
fu@dicellolevitt.com

ROBERT H. KLONOFF
ROBERT KLONOFF, LLC
2425 SW 76TH AVENUE
PORTLAND, OR 97225
Telephone: 503-702-0218
klonoff@usa.net

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Tel: 212.213.8311
hnappi@hrsclaw.com

ANTHONY K. BRUSTER
BRUSTER PLLC
680 N. Carroll Ave., Suite 110
Southlake, TX 76092
(817) 601-9564
akbruster@brusterpllc.com

FRANCOIS M. BLAUDEAU, MD JD FACHE
FCLM
**SOUTHERN INSTITUTE FOR MEDICAL
AND LEGAL AFFAIRS**
2762 B M Montgomery Street, Suite 101
Homewood, Alabama 35209
T: 205.564.2741
francois@southernmedlaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

Attorneys for Plaintiffs

PHILIP J. WEISER

Attorney General
State of Colorado

/s/ Bianca E. Miyata

Bianca E. Miyata, CO Reg. No. 42012,
pro hac vice
Senior Assistant Attorney General
Lauren M. Dickey, CO Reg. No. 45773
First Assistant Attorney General
Megan Paris Rundlet, CO Reg. No. 27474
Senior Assistant Solicitor General
Elizabeth Orem, CO Reg. No. 58309
Assistant Attorney General
Colorado Department of Law
Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6651
bianca.miyata@coag.gov

*Attorneys for Plaintiff State of Colorado, ex rel.
Philip J. Weiser, Attorney General*

ROB BONTA

Attorney General State
of California

/s/ Megan O'Neill

Nick A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Supervising Deputy Attorney General
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer
(CA SBN 336428)
Marissa Roy (CA SBN 318773)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480
Bernard.Eskandari@doj.ca.gov

Attorneys for Plaintiff the People of the State of

California

COVINGTON & BURLING LLP

By: /s/ Ashley M. Simonsen
Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

Phyllis A. Jones, *pro hac vice*
Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
One City Center
850 Tenth Street, NW
Washington, DC 20001-4956
Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

*Attorney for Defendants Meta Platforms, Inc.
f/k/a Facebook, Inc.; Facebook Holdings,
LLC; Facebook Operations, LLC; Facebook
Payments, Inc.; Facebook Technologies, LLC;
Instagram, LLC; Siculus, Inc.; and Mark Elliot
Zuckerberg*

FAEGRE DRINKER LLP

By: /s/ Andrea Roberts Pierson
Andrea Roberts Pierson, *pro hac vice*
Amy Fiterman, *pro hac vice*
FAEGRE DRINKER LLP
300 N. Meridian Street, Suite 2500
Indianapolis, IN 46204
Telephone: + 1 (317) 237-0300
Facsimile: + 1 (317) 237-1000
Email: andrea.pierson@faegredrinker.com
Email: amy.fiterman @faegredrinker.com

GEOFFREY DRAKE, *pro hac vice*
David Mattern, *pro ha vice*
KING & SPALDING LLP
1180 Peachtree Street, NE, Suite 1600
Atlanta, GA 30309
Tel.: 404-572-4600
Email: gdrake@kslaw.com
Email: dmattern@kslaw.com

*Attorneys for Defendants TikTok Inc. and
ByteDance Inc.*

MUNGER, TOLLES & OLSEN LLP

By: /s/ Jonathan H. Blavin
Jonathan H. Blavin, SBN 230269
MUNGER, TOLLES & OLSON LLP
560 Mission Street, 27th Floor
San Francisco, CA 94105-3089
Telephone: (415) 512-4000
Facsimile: (415) 512-4077
Email: jonathan.blavin@mto.com

Rose L. Ehler (SBN 29652)
Victoria A. Degtyareva (SBN 284199)
Laura M. Lopez, (SBN 313450)
Ariel T. Teshuva (SBN 324238)
MUNGER, TOLLES & OLSON LLP
350 South Grand Avenue, 50th Floor
Los Angeles, CA 90071-3426
Telephone: (213) 683-9100
Facsimile: (213) 687-3702
Email: rose.ehler@mto.com
Email: victoria.degtyareva@mto.com
Email: Ariel.Teshuva@mto.com

Lauren A. Bell (*pro hac vice forthcoming*)
MUNGER, TOLLES & OLSON LLP
601 Massachusetts Ave., NW St.,

Suite 500 E
Washington, D.C. 20001-5369
Telephone: (202) 220-1100
Facsimile: (202) 220-2300
Email: lauren.bell@mto.com

Attorneys for Defendant Snap Inc.

MORGAN LEWIS & BOCKIUS, LLP

By: /s/ Stephanie Schuster
Stephanie Schuster
stephanie.schuster@morganlewis.com
1111 Pennsylvania Ave. NW
Washington, DC 20004-2541

Brian Ercole
brian.ercole@morganlewis.com
600 Brickell Avenue, Suite 1600
Miami, FL 33131-3075
Tel.: 305.415.3416

Yardena R. Zwang-Weissman
yardena.zwang-weissman@morganlewis.com
300 South Grand Avenue, 22nd Floor
Los Angeles, CA 90071-3132
Tel.: 213.612.7238

*Attorneys for Defendants YouTube, LLC,
Google LLC, and Alphabet Inc.*

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

Brian M. Willen
WILSON SONSINI GOODRICH & ROSATI
1301 Avenue of the Americas, 40th Floor
New York, New York 10019
Telephone: (212) 999-5800
Facsimile: (212) 999-5899
Email: bwillen@wsgr.com

Lauren Gallo White
Samantha A. Machock
WILSON SONSINI GOODRICH & ROSATI
One Market Plaza, Spear Tower, Suite 3300
San Francisco, CA 94105
Telephone: (415) 947-2000
Facsimile: (415) 947-2099
Email: lwhite@wsgr.com
Email: smachock@wsgr.com

1 Christopher Chiou
2 WILSON SONSINI GOODRICH & ROSATI
3 633 West Fifth Street
4 Los Angeles, CA 90071-2048
5 Telephone: (323) 210-2900
6 Facsimile: (866) 974-7329
7 Email: cchiou@wsgr.com

8 *Attorneys for Defendants YouTube, LLC,*
9 *Google LLC, and Alphabet Inc.*

10 WILLIAMS & CONNOLLY LLP

11 Joseph G. Petrosinelli
12 jpetrosinelli@wc.com
13 Ashley W. Hardin
14 ahardin@wc.com
15 680 Maine Avenue, SW
16 Washington, DC 20024
17 Telephone.: 202-434-5000
18 Fax: 202-434-5029

19 *Attorneys for Defendants YouTube, LLC,*
20 *Google LLC, and Alphabet Inc.*

ATTESTATION

I, Ashley M. Simonsen, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

DATED: January 12, 2024

/s/ Ashley M. Simonsen

Ashley M. Simonsen, SBN 275203
COVINGTON & BURLING LLP
1999 Avenue of the Stars
Los Angeles, CA 90067
Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com